

LAGOMARSINO LAW  
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**LAGOMARSINO LAW**  
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*Attorneys for Plaintiff Parnell Jay Fair*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

PARNELL JAY FAIR, individually,  
  
Plaintiff,

v.

LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT, a political subdivision of the  
State of Nevada; LUKAS TURLEY, individually;  
ALEXANDER RYNDAL, individually;  
UNIVERSITY MEDICAL CENTER, D/B/A  
UNIVERSITY MEDICAL CENTER OF  
SOUTHERN NEVADA, a Nevada Governmental  
Entity; CHASITY TRAVIS, individually; JENNA  
A. DOUD, individually; JESSE WELLS,  
individually; CASEY ALLEN ROEHR,  
individually; SHAIN HOWARD, individually;  
SCOTT KEVIN LEE, individually; BROCK T.  
WENTZ, individually; DOES I – X, and ROES I  
– X, inclusive

Defendants.

CASE NO: 2:20-cv-01841-JCM-BNW

**STIPULATION AND**  
**ORDER TO EXTEND PLAINTIFF’S**  
**DEADLINE TO FILE HIS RESPONSE TO**  
**DEFENDANT CASEY ALLEN ROEHR,**  
**M.D.’S MOTION TO DISMISS (ECF NO.**  
**57) AND JOINDERS THERETO**

*(First Request)*

WHEREAS Defendant Casey Allen Roehr, M.D. filed his Motion to Dismiss (“Motion”) on  
January 11, 2021 (ECF No. 57) in response to Plaintiff’s Amended Complaint (ECF No. 46).

WHEREAS Defendants University Medical Center d/b/a University Medical Center of  
Southern Nevada (“UMC”) and Chasity Travis filed their Joinder to Defendant Casey Allen Roehr’s  
Motion to Dismiss on January 20, 2021 (ECF No. 65).

1 WHEREAS Defendant Brock T. Wentz, D.O. filed his Joinder to Defendant Casey Allen  
2 Roehr's Motion to Dismiss on January 19, 2021 (ECF No. 64).

3 WHEREAS Defendant Shain Howard, D.O. filed his Joinder to Defendant Casey Allen  
4 Roehr's Motion to Dismiss on January 14, 2021 (ECF No. 63).

5 WHEREAS Defendants Jenna Doud and Jesse Wells filed their Joinder to Defendant Casey  
6 Allen Roehr's Motion to Dismiss on January 14, 2021 (ECF No. 61).

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8 Pursuant to Local Rule IA 6-1(a), the Parties hereby stipulate and agree to extend the  
9 deadline for Plaintiff to file his response to Defendant Casey Allen Roehr's Motion and Joinders  
10 thereto. The current deadline for Plaintiff to respond to Defendant Casey Allen Roehr's Motion is  
11 **January 25, 2021**. The new deadline for Plaintiff to respond to Defendant Casey Allen Roehr's  
12 Motion will be **February 4, 2021**.

13  
14 Good cause exists for the extension because Plaintiff requires a thorough and thoughtful  
15 response. Plaintiff's counsel currently is under competing deadlines, including preparation for an  
16 upcoming trial, depositions, and briefing deadlines. As an office of only three (3) attorneys, these  
17 competing deadlines put additional strain on counsel to ensure briefing is thoroughly and  
18 thoughtfully compiled. Moreover, one of the attorneys in the plaintiff's office has recently returned  
19 from a two-week quarantine and recovery from COVID-19. As a result, the other two attorneys in  
20 the office had to cover other deadlines. Finally, the office is typically staffed with an additional law  
21 clerk who has recently left the office to extern for the United States District Court leaving the office  
22 temporarily shorthanded.  
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This extension is the first request for an extension and is not submitted for the purpose of delay.

**IT IS SO STIPULATED AND AGREED.**

DATED this 22<sup>nd</sup> day of January, 2021.

DATED this 22<sup>nd</sup> day of January, 2021.

LAGOMARSINO LAW

LEWIS BRISBOIS BISGAARD & SMITH LLP

/s/ Daven P. Cameron  
Andre M. Lagomarsino, Esq. (#6711)  
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/s/ Melanie L. Thomas  
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*Attorneys for Defendant Brock T. Wentz, M.D.*

DATED this 22<sup>nd</sup> day of January, 2021.

DATED this 22<sup>nd</sup> day of January, 2021.

KAEMPFER CROWELL

PITEGOFF LAW OFFICE

/s/ Ryan W. Daniels  
Lyssa S. Anderson, Esq.  
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and Alexander Ryndak*

/s/ Jeffrey I. Pitegoff  
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Las Vegas, Nevada 89128  
*Attorney for Defendants University Medical  
Center and Chasity Travis*

DATED this 22<sup>nd</sup> day of January, 2021.

DATED this 22<sup>nd</sup> day of January, 2021.

McBRIDE HALL

JOHN H. COTTON & ASSOCIATES, LTD.

/s/ Sean M. Kelly  
Robert C. McBride, Esq.  
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*Attorney for Defendant Jenna Doud  
and Jesse Wells*

/s/ Brad J. Shipley  
John H. Cotton, Esq.  
Brad J. Shipley, Esq.  
7900 West Sahara Avenue, Suite 200  
Las Vegas, Nevada 89117  
*Attorneys for Defendant Scott Kevin Lee*

///

///

1 DATED this 22<sup>nd</sup> day of January, 2021.

DATED this 22<sup>nd</sup> day of January, 2021.

2 LEWIS BRISBOIS BISGAARD & SMITH LLP

LAURIA TOKUNAGA GATES & LINN, LLP

3 /s/ Katherine J. Gordon

/s/ Anthony D. Lauria

4 Katherine J. Gordon, Esq.  
6385 South Rainbow Blvd., Suite 600  
5 Las Vegas, NV 89118  
6 *Attorney for Dr. Casey Roehr, M.D.*

Anthony D. Lauria, Esq.  
601 South Seventh Street  
Las Vegas, Nevada 89101  
*Attorney for Defendant Shain Howard*

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8 **IT IS SO ORDERED.**

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UNITED STATES DISTRICT COURT JUDGE

11 DATED: February 26, 2021  
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